

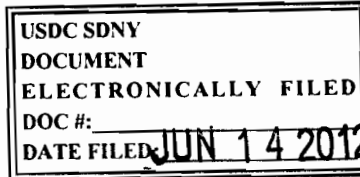


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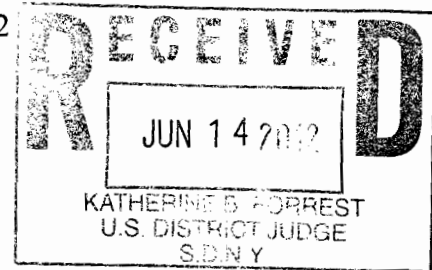
ADMITTED IN NEW YORK,
CONNECTICUT, NEW JERSEY
& MASSACHUSETTS



June 13, 2012

BY MESSENGER

The Honorable Katherine B. Forrest
United States District Court
Southern District of New York
500 Pearl Street, Room 745
New York, New York 10007



Re: Atlantic Ro-Ro Carriers, Inc. v. OJSC "Surgutneftegas," *et al.*
11 Civ. 06631 (KBF)
Our file no.: 2677010

Dear Judge Forrest:

We are attorneys for plaintiff Atlantic Ro-Ro Carriers, Inc. ("ARRC") in this action, which seeks declaratory relief relating to the \$500 per package limitation under the Carriage of Goods by Sea Act. We write with the consent of all counsel to request a ninety (90) day extension of the scheduling deadlines set forth in the Court's February 17, 2012, Scheduling Order (Docket no. 10) and a corresponding adjournment of the status conference set for June 15, 2012, at 10:00 a.m.

Per the Court's Scheduling Order, fact discovery is to be completed by this Friday, June 15, 2012. An extension of the scheduling deadlines is principally sought because, based on additional investigation into the loss and damage to the cargo in suit, ARRC has decided to retain defendant Spe Rigco Inc. ("SPE") in the lawsuit, contrary to previous representations made to the Court at the February 17, 2012, status conference. In that vein, ARRC has given SPE a time extension to appear and answer in this action until July 13, 2012.

Moreover, although document requests have been served, document discovery is still an on-going process. Once defendant SPE appears in the action, it is expected that discovery will proceed at a faster pace and should be completed within the time frame set forth in the proposed Amended Scheduling Order enclosed.

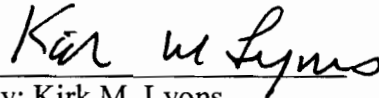
For these reasons, the parties seek an extension of the scheduling deadlines as set forth in the proposed Amended Scheduling Order enclosed.

In addition, the parties respectfully request that the Court adjourn the status conference currently scheduled for Friday, June 15, 2012, at 10:00 a.m. to a date to be chosen by the Court in line with the Amended Scheduling Order.

We thank you for your attention to this matter.

Respectfully yours,

Lyons & Flood, LLP


By: Kirk M. Lyons

We will
meet on 6/15/12
and discuss
the schedule
then.
K. B. For
USDJ
6/14/12

Encl.

BY FACSIMILE

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